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8  
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 TRIUNFO, INC., F.K.A. CATALINA  
12 GRAPHIC FILMS, INC., a Nevada  
corporation,

13 Plaintiff,  
vs.

14 GLOBAL GRAPHIC RESOURCES LLC,  
15 a Minnesota limited liability company and  
DARYL K. HANZAL, an individual, and  
16 DOES 1-10,

17 Defendant.

18 **2:19-cv-1164-RFB-DJA**

19 *Consolidated with Case No. 2:18-cv-1913-*  
*RFB-DJA*

20 **STIPULATION AND ORDER TO**  
**EXTEND PROPOSED JOINT**  
**PRETRIAL ORDER DEADLINE**

21 **(FIRST REQUEST)**

22 GLOBAL GRAPHIC RESOURCES LLC,  
23 a Minnesota limited liability company and  
DARYL K. HANZAL, an individual,

24 Plaintiffs,  
vs.

25 TRIUNFO, INC., F.K.A. CATALINA  
GRAPHIC FILMS, INC., a Nevada  
Corporation,

26 Defendant.

27 Plaintiff/Cross-Defendant Triunfo, Inc., f.k.a. Catalina Graphic Films, Inc. ("Catalina"), by  
and through its counsel Nicholas M. Wieczorek, Esq. and Gia N. Marina, Esq., of the law firm of  
28 Clark Hill PLLC, and Defendants/CrossPlaintiffs Global Graphic Resources LLC ("GGR") and

1 Daryl K. Hanzal (“Hanzal”), hereby stipulate to extend the pre-trial order deadline for a period of  
 2 seven (7) days.

3 Lead counsel for Catalina has been ill for the past week and been physically unable to go  
 4 into his office for the last three days. Accordingly, counsel has been unable to confer with counsel  
 5 for Defendant regarding the agreed content of the joint pre-trial order, or respond to various changes  
 6 and modifications made by counsel regarding the order. In recognition of the fact that the order  
 7 contemplates direct discussions and agreements between counsel for the parties to the matter,  
 8 Plaintiff requests a one-week extension to submit the joint pre-trial order containing agreed content.

9 WHEREFORE, the parties stipulate the deadline for filing the pretrial order be extended up  
 10 to and including **May 5, 2023**.

11 Dated this 27<sup>th</sup> day of April, 2023.

12 **FOX ROTHSCHILD LLP**

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 14 By: /s/Eric J. Nystrom  
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*Attorneys for Global Graphic Resources LLC  
 and Daryl K. Hanzal*

Dated this 27<sup>th</sup> day of April, 2023.

**CLARK HILL PLLC**

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 22 By: /s/Nicholas M. Wieczorek  
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*Attorneys for Plaintiff Triunfo, Inc.,  
 f.k.a. Catalina Graphic Films, Inc.*

23 **IT IS SO ORDERED:**

24  
 25 RICHARD F. BOULWARE, II  
 UNITED STATES DISTRICT JUDGE

26 DATED this 28th day of April, 2023

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Clark Hill PLLC, and that on this 27<sup>th</sup> day of April, 2023, a true and correct copy of the foregoing **Stipulation and Order to Extend the Proposed Joint Pre-Trial Order Deadline** was served via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk:

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